

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**STATE OF OHIO, ex rel.
ATTORNEY GENERAL DAVE YOST**

Plaintiffs,

v.

AARON MICHAEL JONES, et al.

Defendants.

Civil Action No. 2:22-cv-2700
Chief Judge Algenon L. Marbley
Magistrate Judge Kimberly A. Jolson

JOINT MOTION OF ENTRY OF PROTECTIVE ORDER

Plaintiff State of Ohio, ex rel Attorney General Yost and Defendants Roy Cox Jr. and Julie Bridge file this Joint Motion for Entry of Protective Order, and in support thereof, respectfully show the Court as follows:

The Protective Order, attached hereto as Exhibit A, addresses the concerns shared by the Plaintiff States about disclosure of confidential information that may be exchanged through discovery in this litigation. All parties have agreed to the attached Protective Order for entry by the Court. Pro se Defendant, June Batista was provided a copy of the draft Protective Order and stated that she has no objection to the entry of the Protective Order.

WHEREFORE, the moving parties respectfully request that the Protective Order attached hereto as Exhibit A be entered. For the Court's convenience, a redline comparison to the Court's standard tier-one protective order is also attached as Exhibit B.

Respectfully Submitted,

FOR THE STATE OF OHIO:

DAVE YOST

Attorney General for the State of Ohio

s/ Erin B. Leahy

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FOR THE DEFENDANTS:

Roy Melvin Cox, Jr.

Julie Ann Bridge

s/ Justin Whittaker by s/ Erin B. Leahy per email authorization _

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s/ M. Candice Crosby by s/ Erin B. Leahy per email authorization _

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Certificate of Service

Pursuant to FEDERAL RULE OF CIVIL PROCEDURE 5(a), I hereby certify that on December 13, 2022, a true and correct copy of the above and foregoing document has been served using the CM/ECF system to all counsel of record and via certified USPS mail delivery and electronic mail the following:

June Ann Batista

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Defendant, Pro Se

/s/ Erin B. Leahy

ERIN B. LEAHY

ASSISTANT ATTORNEY GENERAL